

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION**

In re:	)	
	)	Chapter 11 (Subchapter V)
Free Speech Systems, LLC,	)	
	)	Case No. 22-60043 (CML)
Debtor.	)	
	)	

**THE SANDY HOOK PLAINTIFFS' WITNESS AND EXHIBIT LIST FOR HEARING  
SCHEDULED FOR AUGUST 3, 2022 AT 10:00 A.M. (PREVAILING CENTRAL TIME)**

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Neil Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, and Marcel Fontaine (collectively, the “Texas Plaintiffs”) and David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel, Donna Soto, Carlee Soto Parisi, Carlos M. Soto, Jillian Soto-Marino, William Aldenberg, William Sherlach, and Robert Parker (collectively, the “Connecticut Plaintiffs”, and, together with the Texas Plaintiffs, the “Sandy Hook Plaintiffs”, creditors and parties-in-interest in the above-captioned case (“Bankruptcy Case”), file their Witness and Exhibit List for the hearing to be held on August 3, 2022, at 10:00 a.m. (prevailing Central Time) (the “Hearing”) as follows:

**WITNESSES**

The Sandy Hook Plaintiffs may call the following witnesses at the Hearing:

1. W. Marc Schwartz.
2. Any witness called or designated by any other party.
3. Any witness necessary to rebut the evidence or testimony of any witness offered or designated by any other party

**EXHIBITS**

<b>EXHIBIT</b>	<b>DESCRIPTION</b>	<b>MARK</b>	<b>OFFER</b>	<b>OBJECT</b>	<b>ADMIT</b>	<b>W/D</b>	<b>DISPOSITION AFTER TRIAL</b>
<b>1.</b>	Debtor's Voluntary Petition for Non-Individuals Filing for Bankruptcy [Docket No. 1].						
<b>2.</b>	Debtor's Emergency Motion for Interim and Final Orders (I) Authorizing the Use of Cash Collateral Pursuant to Section 105, 361, and 363 of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 4001(b) and (II) Granting Adequate Protection to the Pre-Petition Secured Lender [Docket No. 6].						
<b>3.</b>	Declaration of W. Marc Schwartz in Support of Voluntary Petition and First Day Motions [Docket No. 10].						
<b>4.</b>	Debtors' Emergency Application for Interim and Final Orders (A) Authorizing Employment of W. Marc Schwartz as Chief Restructuring Officer, (B) Authorizing Employment of Staff of Schwartz Associates, LLC in Discharge of Duties as Chief Restructuring Officer, and (C) Granting Related Relief, <i>In re InfoW, LLC et al.</i> , Case No. 22-60020-CML (Bankr. S.D. Tex) [Docket No. 7].						
<b>5.</b>	Declaration of W. Marc Schwartz Regarding Bankruptcy Code § 1116(1) Requirements, <i>In re InfoW, LLC et al.</i> , Case No. 22-60020-CML (Bankr. S.D. Tex) [Docket No. 42-1].						

EXHIBIT	DESCRIPTION	MARK	OFFER	OBJECT	ADMIT	W/D	DISPOSITION AFTER TRIAL
6.	Signed Stipulation and Agreed Order Dismissing Debtors' Chapter 11 Cases, <i>In re InfoW, LLC et al.</i> , Case No. 22-60020-CML (Bankr. S.D. Tex) [Docket No. 114].						
7.	Transcript of Hearing dated A, pr. 22, 2022, <i>In re InfoW, LLC et al.</i> , Case No. 22-60020-CML (Bankr. S.D. Tex).						
8.	Mary Papenfuss, <i>Alex Jones Gloats About Bankruptcy Plot To Tie Up Sandy Hook Damages 'For Years'</i> , MSN (Aug. 1, 2022), <a href="https://www.msn.com/en-us/money/other/alex-jones-gloats-about-bankruptcy-plot-to-tie-up-sandy-hook-damages-for-years/ar-AA10cDan?ocid=msedgntp&amp;cvid=d8d7f30d75c7420b82d47ad87af8f803">https://www.msn.com/en-us/money/other/alex-jones-gloats-about-bankruptcy-plot-to-tie-up-sandy-hook-damages-for-years/ar-AA10cDan?ocid=msedgntp&amp;cvid=d8d7f30d75c7420b82d47ad87af8f803</a> .						
9.	Order on Plaintiff's Motion for Default Judgment, <i>Heslin v. Jones</i> , Case No. D-1-GN-18-001835 (Tex. Dist. Ct. Sept. 27, 2021).						
10.	Court's Ruling, <i>Lafferty et al. v. Jones, et al.</i> , XO6 UWY CVIS-6046436-S, <i>Sherlach et al. v. Jones, et al.</i> , Case Nos. XO6 UWY CVIS-6046437-S, XO6 UWY CVIS-6046438-S (Conn. Sup. Ct. Nov. 15, 2021).						
11.	Oral and Videotaped Deposition of Brittany Paz, Corporate Representative of Free Speech Systems, LLC, <i>Fontaine v. InfoWars, LLC</i> , Cause No. D-1-GN-18-001605 (Tex. Dist. Ct. Feb. 15, 2022).						
12.	Deposition Notes by Corporate Representative of Free Speech Systems, LLC, dated Feb. 15, 2022.						

EXHIBIT	DESCRIPTION	MARK	OFFER	OBJECT	ADMIT	W/D	DISPOSITION AFTER TRIAL
13.	Plaintiffs' Original Petition, <i>Heslin v. Jones</i> , Cause No. D-1-GN-22-001610 (Tex. Dist. Ct. filed Apr. 4, 2022).						
14.	Oral and Videotaped Deposition of Alex Jones, Volume III, <i>Lafferty et al. v. Jones, et al.</i> , XO6 UWY CVIS-6046436-S, <i>Sherlach et al. v. Jones, et al.</i> , Case Nos. XO6 UWY CVIS-6046437-S, XO6 UWY CVIS-6046438-S (Conn. Sup. Ct. June 21, 2022).						
15.	Videotaped Deposition of Brittany Paz, Volume III, <i>Lafferty et al. v. Jones, et al.</i> , XO6 UWY CVIS-6046436-S, <i>Sherlach et al. v. Jones, et al.</i> , Case Nos. XO6 UWY CVIS-6046437-S, XO6 UWY CVIS-6046438-S (Conn. Sup. Ct. June 21, 2022).						
16.	Any document or pleading filed in the above-captioned main cases						
17.	Any exhibit necessary for impeachment and/or rebuttal purposes						
18.	Any exhibit identified or offered by any other party						

### RESERVATION OF RIGHTS

The Sandy Hook Plaintiffs reserve the right to call or to introduce one or more, or none, of the witnesses and exhibits listed above, and further reserve the right to supplement this list prior to the Hearing.

Dated: August 3, 2022

Respectfully submitted,

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**Certificate of Service**

I certify that on August 3, 2022, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Jarrod B. Martin

Jarrod B. Martin